

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, ET AL.

Plaintiffs,

v.

BRAD RAFFENSPERGER, ET AL.

Defendants.

CIVIL ACTION No.: 1:17-cv-02989-AT

**MOTION TO FILE REPLY BRIEF IN EXCESS OF PAGE LIMIT**

NOW COMES Nonparty Cathleen Lathan and moves this Court to permit her to file her Reply Brief in Support of Motion to Quash in excess of the 15-page limit, showing this Court as follows:

1. Mrs. Latham had four business days to prepare her original Motion to Quash, as Plaintiffs served their subpoena on August 8, 2022 purporting to require compliance on August 15, 2022. As a result of the short timeframe, Mrs. Latham's initial motion was only 12 pages long and was only able to hit the high points of fact and law.
2. Plaintiffs' filings in response total almost 700 pages between their brief and exhibits.

3. Plaintiffs have raised numerous issues in their Response, each of which requires detailed factual and legal refutation.
4. The motion at issue is of critical importance to Mrs. Latham, as it threatens not only her considerable privacy interests but also her confidential and privileged legal communications and the preservation of her Fifth Amendment privileges in the face of two ongoing criminal investigations.
5. Despite diligent effort, Mrs. Latham's counsel has not been able to confine the necessary legal and factual points to oppose the motion to 15-pages.

WHEREFORE, Mrs. Latham requests that this Court grant her request to file its Reply Brief in excess of the page limit. In the event that the Court denies this motion, Plaintiff requests an opportunity to re-file a Reply within the 15-page limit.

Dated: September 13, 2022

Respectfully submitted,  
**CHEELEY LAW GROUP, LLC**

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*Counsel for Nonparty Cathleen Latham*

**CERTIFICATE OF SERVICE**

I certify that today I filed the foregoing MOTION TO FILE REPLY BRIEF  
IN EXCESS OF PAGE LIMITS via the Court's CM/ECF system, which  
automatically serves all counsel of record.

Dated: September 13, 2022

/s/ Holly A. Pierson  
Holly A. Pierson  
Georgia Bar No. 579655